



**David Penton**  
Operations Lead East

US EPA RECORDS CENTER REGION 5



585727

February 8, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: January 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This January 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of January, the Site One Team have logged a total of 1,189,106 incident free work hours;
- On January 12<sup>th</sup>, Chevron Environmental Management and Real Estate Company (CEMREC) submitted to the Illinois Environmental Protection Agency (IEPA) a change of Project Coordinator notification changing from Mr. Henry Stremlau to Mr. David Penton;
- On January 14<sup>th</sup>, IEPA provided comments on the Separator 7 Area Pre-Remedial Design Evaluation Report submitted by CEMREC on December 7, 2020;
- A Chevron/Lawrence County Community Advisory Council meeting was held virtually (due to Covid-19 restrictions) the evening of January 19<sup>th</sup>;
- On January 19<sup>th</sup>, water samples were collected and analyzed for quarterly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on February 1<sup>st</sup>;
- CEMREC completed initial Tank Farm and Main Processing Area (TF/MPA) delineation sampling on January 20<sup>th</sup> in accordance with the approved work plan dated November 16, 2020;
- On January 27<sup>th</sup>, CEMREC submitted to IEPA a response to IEPA Feasibility Comments originally provided on January 13, 2020 with additional comments from IEPA on the Feasibility Study regarding USEPA comments on ARARs on December 10, 2021;
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted;
- Site security and maintenance continued; and

**Chevron**  
**Environmental Management Company**  
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- No significant problems occurred during this reporting period.

Activities planned for the month of February 2021 include:

- Collect water samples from Outfall 001 and analyze for monthly NPDES parameters as specified in permit number IL0004219;
- Additional delineation based on the results of the first round of sampling in the TF/MPA and the Floodplain Forest will occur in February;
- Sampling of the two remaining groundwater monitoring wells for the Sulfate Land Application Pilot Study Area will occur if accessible;
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall will continue;
- Continue site security and maintenance; and
- No significant problems are anticipated for the month of February 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,

2/8/2021

X 

---

David Penton

Signed by: David Penton

**David Penton**  
Project Operations Lead

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Henry Stremlau, CEMREC

Dave Arnold, Stantec  
Ronald Clark, IDPH  
Mike Coffey, USFWS  
Eric Hetrick, CEMREC

Jay Timm, IEPA  
Beth Whetsell, IDNR  
Ray Mastrolonardo, Tetra-Tech  
John Aweeka, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Keith Rittle, Trihydro



**David Penton**  
Operations Lead East

March 9, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: February 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This February 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of February, the Site One Team have logged a total of 1,191,365 incident free work hours.
- Chevron Environmental Management and Real Estate Company (CEMREC) continued additional delineation of the Tank Farm/Main Processing Area (TF/MPA) and Floodplain Forest on February 4<sup>th</sup> based on results from the initial delineation sampling effort.
- On February 16<sup>th</sup>, Illinois Environmental Protection Agency (IEPA) provided comments on the Wastewater Treatment System Primary Basin Sediment Removal Activities Report submitted by CEMREC on December 15, 2020.
- On February 24<sup>th</sup>, water samples were collected and analyzed for monthly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on March 2<sup>nd</sup>.
- On February 25<sup>th</sup> and 26<sup>th</sup>, IEPA provided questions regarding CEMREC's response to IEPA Feasibility Comments dated January 27, 2021.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued
- No significant problems occurred during this reporting period.

Activities planned for the month of March 2021 include:

- Collect water samples from Outfall 001 and analyze for quarterly NPDES parameters as specified in permit number IL0004219.

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**Environmental Management Company**  
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- Based on the results of the first round of sampling, additional delineation of focus areas within the TF/MPA and the Floodplain Forest will continue in March.
- A virtual Chevron/Lawrence County Community Advisory Council meeting is scheduled for the evening of March 16<sup>th</sup>.
- Quarterly monitoring for the Sulfate Land Application Pilot Study Area will occur the week of March 22<sup>nd</sup>.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall will continue.
- Continue site security and maintenance
- No significant problems are anticipated for the month of March 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,

3/10/2021

X 

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David Penton

Signed by: David Penton

**David Penton**  
Project Operations Lead

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Henry Stremlau, CEMREC

Dave Arnold, Stantec  
Ronald Clark, IDPH  
Mike Coffey, USFWS  
Eric Hetrick, CEMREC

Jay Timm, IEPA  
Beth Whetsell, IDNR  
Ray Mastrolonardo, Tetra-Tech  
John Aweeka, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Keith Rittle, Trihydro





David Penton  
Operations Lead East

April 9, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: March 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This March 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of March, the Site One Team have logged a total of 1,193,768 incident free work hours.
- Chevron Environmental Management and Real Estate Company (CEMREC) continued additional delineation of the Tank Farm/Main Processing Area (TF/MPA) and Floodplain Forest based on results from the initial delineation sampling effort.
- On March 2<sup>nd</sup>, Illinois Environmental Protection Agency (IEPA) provided comments regarding the Bioventing/Air Sparging Pilot Test Work Plan submitted by CEMREC on December 30, 2021.
- On March 2<sup>nd</sup>, 5<sup>th</sup>, 20<sup>th</sup>, and 24<sup>th</sup>, the Waste Water Treatment System (WWTS) treated discharge was directed to the off-test area due to elevated river water levels which did not allow for gravity discharge from the WWTS. The WWTS treated discharge was directed back to the river when water levels receded on March 3<sup>rd</sup>, 7<sup>th</sup>, 22<sup>nd</sup> and 25<sup>th</sup> respectively.
- On March 3<sup>rd</sup>, CEMREC provided a response to IEPA's February 16<sup>th</sup> comments on the Wastewater Treatment System Primary Basin Sediment Removal Activities Report.
- On March 3<sup>rd</sup>, CEMREC provided responses to IEPA's February 25<sup>th</sup> and 26<sup>th</sup> questions regarding CEMREC's response to IEPA Feasibility Comments.
- On March 16<sup>th</sup>, water samples were collected and analyzed for quarterly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on March 26<sup>th</sup>.
- A Chevron/Lawrence County Community Advisory Council meeting was held virtually (due to Covid-19 restrictions) the evening of March 16<sup>th</sup>.

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- On March 18<sup>th</sup>, the IEPA requested by email additional information regarding the status of the TF/MPA and Floodplain Forest delineation soil sampling and an update on the Sulfate Groundwater Pilot Testing occurring in Tank Farms E and F. CEMREC responded on March 18<sup>th</sup> providing an update to the Sulfate Pilot Testing and to set up a call regarding status of the TF/MPA and Floodplain Forest delineation.
- CEMREC and IEPA had a virtual meeting on March 24<sup>th</sup> to discuss the delineation activities performed to date in the TF/MPA and Floodplain Forest. CEMREC also discussed the planned locations for additional necessary delineation.
- On March 24<sup>th</sup>, Illinois Department of Natural Resources provided an email to CEMREC requesting to be involved with the review of the Feasibility Study.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of April 2021 include:

- Collect water samples from Outfall 001 and analyze for monthly NPDES parameters as specified in permit number IL0004219.
- Based on the results of the first round of sampling, additional delineation of focus areas within the TF/MPA and the Floodplain Forest will continue in April.
- Operations of the Biocells to treat the contaminated soil pile may resume in late April.
- Removal of the remaining pipelines within the Separator 7 area in accordance with the *Separator 7 Piping and Debris Removal Work Plan* dated April 22, 2020 may begin in late April.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall will continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of April 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,

**David Penton**  
Project Operations Lead



cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Henry Stremmlau, CEMREC

Dave Arnold, Stantec  
Ronald Clark, IDPH  
Mike Coffey, USFWS  
Eric Hetrick, CEMREC

Jay Timm, IEPA  
Beth Whetsell, IDNR  
Ray Mastrodonardo, Tetra-Tech  
John Aweeka, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Keith Rittle, Trihydro



**David Penton**  
Operations Lead East

May 10, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: April 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This April 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of April, the Site One Team have logged a total of 1,195,592 incident free work hours.
- On April 1st, Chevron Environmental Management and Real Estate Company (CEMREC) provided Illinois Environmental Protection Agency (IEPA) with a copy of preliminary data tables and the figures that were presented during a virtual meeting on March 24<sup>th</sup> to discuss the delineation activities performed to date in the Tank Farm/Main Process Area (TF/MPA) and Floodplain Forest.
- CEMREC continued additional delineation of the TF/MPA and Floodplain Forest based on results from the initial delineation sampling effort.
- On April 6<sup>th</sup>, water samples were collected and analyzed for monthly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on April 20<sup>th</sup>.
- CEMREC and IEPA held a virtual meeting on April 22<sup>nd</sup> to discuss the Feasibility Study format for revisions and resubmittal.
- On April 26<sup>th</sup>, CEMREC provided a response to IEPA's January 14<sup>th</sup> comments and a revised Pre-Remedial Design Evaluation Report of the Bench Scale Treatability Study results for the Separator 7 area. CEMREC also provided notification that it plans to begin the removal of remaining underground pipelines in the Separator 7 area starting the week of May 10<sup>th</sup>.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.



Activities planned for the month of May 2021 include:

- Collect water samples from Outfall 001 and analyze for monthly NPDES parameters as specified in permit number IL0004219.
- Based on the results of the sampling in April, additional delineation focused areas within the TF/MPA and the Floodplain Forest may continue in May pending analytical results.
- Removal of the remaining underground pipelines within the Separator 7 area in accordance with the *Separator 7 Piping and Debris Removal Work Plan* dated April 22, 2020 will begin the week of May 10<sup>th</sup>.
- A virtual Chevron/Lawrence County Community Advisory Council meeting is scheduled for the evening of May 18<sup>th</sup>.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall will continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of May 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,

*David Penton*

**David Penton**  
Project Operations Lead

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Henry Stremiau, CEMREC

Dave Arnold, Stantec  
Ronald Clark, IDPH  
Mike Coffey, USFWS  
Eric Hetrick, CEMREC

Jay Timm, IEPA  
Beth Whetsell, IDNR  
Ray Mastrolonardo, Tetra-Tech  
John Aweeka, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Keith Rittle, Trihydro



David Penton  
Operations Lead East

June 14, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: May 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This May 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of May, the Site One Team have logged a total of 1,198,828 incident free work hours.
- On May 4<sup>th</sup>, water samples were collected and analyzed for monthly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on May 18<sup>th</sup>.
- On May 7<sup>th</sup>, Illinois Environmental Protection Agency (IEPA) provided a Draft evaluation of the Chevron Environmental Management and Real Estate Company (CEMREC) responses to IEPA comments on the Draft Feasibility Study.
- On May 10<sup>th</sup>, CEMREC provided IEPA with a response to IEPA comments on the Bioventing/Air Sparging Pilot Test Revised Work Plan.
- On May 10<sup>th</sup>, CEMREC responded to the Illinois Department of Natural Resources March 24<sup>th</sup> email regarding the Feasibility Study and the Floodplain Forest.
- On May 10<sup>th</sup>, removal of the remaining underground pipelines within the Separator 7 area was initiated in accordance with the *Separator 7 Piping and Debris Removal Work Plan* dated April 22, 2020.
- On May 14<sup>th</sup>, IEPA provided follow-up comments to their evaluation of the CEMREC responses to IEPA comments on the Draft Feasibility Study.
- A Chevron/Lawrence County Community Advisory Council meeting was held virtually (due to Covid-19 restrictions) the evening of May 18<sup>th</sup>.
- On May 25<sup>th</sup>, IEPA provided a review and no further comment to CEMREC's April 26<sup>th</sup> response to comments and a revised Pre-Remedial Design Evaluation Report of the Bench Scale Treatability Study results for the Separator 7 area.

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Environmental Management Company  
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- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of June 2021 include:

- Collect water samples from Outfall 001 and analyze for quarterly NPDES parameters as specified in permit number IL0004219.
- Based on the results of the sampling in April, additional delineation of focused areas within the TF/MPA and the Floodplain Forest will be completed.
- Removal of the remaining underground pipelines within the Separator 7 area in accordance with the *Separator 7 Piping and Debris Removal Work Plan* dated April 22, 2020 will continue.
- An annual inspection and inventory of the trees and vegetation planted along the Embarrass River bank is scheduled for the week of June 21<sup>st</sup> as part of the stabilization project.
- Quarterly monitoring for the Sulfate Land Application Pilot Study Area is scheduled for the week of June 21<sup>st</sup>.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall will continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of June 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,



**David Penton**  
Project Operations Lead

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Henry Stremlau, CEMREC

Dave Arnold, Stantec  
Ronald Clark, IDPH  
Ray Mastrodonardo, Tetra-Tech  
Eric Hetrick, CEMREC

Brad Frost, IEPA  
Beth Whetsell, IDNR  
Keith Rittle, Trihydro

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
John Aweeka, CEMREC



**David Penton**  
Operations Lead East

July 14, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: June 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This June 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of June, the Site One Team have logged a total of 1,202,323 incident free work hours.
- On June 1<sup>st</sup>, Illinois Environmental Protection Agency (IEPA) transmitted a letter to United States Environmental Protection Agency (USEPA) advising them that Chevron Environmental Management and Real Estate Company (CEMREC) intends to move forward with the CERLCA process in accordance with the memorandum of agreement with IEPA as the lead agency.
- On June 4<sup>th</sup>, the Land Treatment Unit Asbestos Containing Material Work Plan was submitted to IEPA.
- On June 7<sup>th</sup>, water samples were collected and analyzed for quarterly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on June 22<sup>nd</sup>.
- On June 7<sup>th</sup>, CEMREC transmitted a letter to IEPA requesting a discussion of the timeline for the Feasibility Study submittal.
- On June 14<sup>th</sup>, Additional soil samples were collected from select areas of the Floodplain Forest and Main Process Area as part of the delineation work plans. No additional delineation samples are anticipated to be collected at this time.
- On June 17<sup>th</sup>, IEPA provided CEMREC with an email discussing the Feasibility Study submittal schedule and the topics of interest for an upcoming (July 14) conference call. CEMREC responded to the email on June 18<sup>th</sup> providing responses to IEPA schedule questions and further details regarding the meeting on July 14<sup>th</sup>. IEPA agreed to the Feasibility Study schedule in an email to CEMREC on June 23<sup>rd</sup>.
- On June 18<sup>th</sup>, the Separator 7 piping and debris removal activities were completed in accordance with the *Separator 7 Piping and Debris Removal Work Plan*.

**Chevron**  
**Environmental Management Company**  
250 Industrial Road, RM-112 CEMREC Facility, Pascagoula, MS 39581  
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- On June 22<sup>nd</sup> and 23<sup>rd</sup>, the quarterly groundwater monitoring for the Sulfate Land Application Pilot Study was conducted.
- On June 24<sup>th</sup>, the annual inspection and inventory of the trees and vegetation planted along the Embarrass River bank as part of the stabilization project was completed.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of July 2021 include:

- Collect water samples from Outfall 001 and analyze for monthly NPDES parameters as specified in permit number IL0004219.
- Planning and preparation for the implementation of Bioventing/Air Sparging Pilot Test Work Plan that was approved by IEPA on July 1<sup>st</sup>. The installation of the new wells may occur in early August.
- Preparation of the Separator 7 Pilot Scale Work Plan and submittal to IEPA.
- A conference call is scheduled between CEMREC and IEPA on July 14<sup>th</sup> to discuss the FS evaluation comments.
- A Chevron/Lawrence County Community Advisory Council meeting will be held in person and virtually the evening of July 20<sup>th</sup>.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of July 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,



**David Penton**  
Project Operations Lead

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Mastrolonardo, Tetra-Tec

Dave Arnold, Stantec  
Ronald Clark, IDPH  
John Aweeka, CEMREC

Brad Frost, IEPA  
Beth Whetsell, IDNR  
Henry Stremmlau, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Eric Hetrick, CEMREC Ray





**David Penton**  
Operations Lead East

August 13, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: July 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This July 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of June, the Site One Team have logged a total of 1,204,924 incident free work hours.
- On July 1<sup>st</sup>, Illinois Environmental Protection Agency (IEPA) transmitted a letter to Chevron Environmental Management and Real Estate Company (CEMREC) approving the Bioventing/Air Sparging Pilot Test Work Plan dated May 10, 2021.
- On July 8<sup>th</sup>, CEMREC transmitted their Response to the IEPA Evaluation of Response to Feasibility Study (FS) comments and a draft agenda for a July 14<sup>th</sup> meeting via email and hard copy.
- On July 14<sup>th</sup>, CEMREC and IEPA met via conference call to discuss elements and the structure of the FS report.
- IEPA provided a proposed format for the Feasibility Study report via email on July 15<sup>th</sup> for discussion with CEMREC.
- On July 20<sup>th</sup>, CEMREC and IEPA met at the Site to continue discussion of the FS response to comments and the structure of the report.
- On July 20<sup>th</sup>, A Chevron/Lawrence County Community Advisory Council meeting was held in Lawrenceville in person and virtually with IEPA in attendance.
- On July 21<sup>st</sup>, IEPA provided CEMREC with an email transmitting additional comments generated from the July 8<sup>th</sup> CEMREC response letter.
- On July 21<sup>st</sup>, IEPA transmitted a letter that provided review comments on the Land Treatment Unit Asbestos Containing Material Removal Work Plan dated June 4, 2021.

- A monthly water sample was not collected for National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219 due to low water levels and no discharge to the river.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of August 2021 include:

- Collect water samples from Outfall 001 and analyze for monthly NPDES parameters as specified in permit number IL0004219 if there is sufficient flow to the outfall.
- Planning and preparation for the implementation of Bioventing/Air Sparging Pilot Test Work Plan that was approved by IEPA on July 1<sup>st</sup>. The installation of the new wells for the testing is anticipated to take place in late August or early September.
- Preparation of the Separator 7 Pilot Scale Work Plan and submittal to IEPA.
- Submittal of a revised LTU Asbestos Containing Material Removal Work Plan.
- Interim submittals to IEPA of supplemental information to support the FS review including revised Remedial Action Objectives and a draft vapor intrusion screening level assessment.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of August 2021.

Please contact me at (228) 938-5636 with any questions regarding this submittal.

Sincerely,



Matt Mitchell on behalf of David Penton

**David Penton**  
Project Operations Lead

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Mastrolonardo, Tetra-Tec

Dave Arnold, Stantec  
Ronald Clark, IDPH  
John Aweeka, CEMREC

Brad Frost, IEPA  
Beth Whetsell, IDNR  
Henry Stremlau, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Eric Hetrick, CEMREC Ray



September 14, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: August 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This August 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of August, the Site One Team have logged a total of 1,207,262 incident free work hours.
- On August 4<sup>th</sup>, water samples were collected and analyzed for monthly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on August 12<sup>th</sup>.
- On August 5<sup>th</sup>, Chevron Environmental Management and Real Estate Company (CEMREC) submitted a draft Table of Contents via email to the Illinois Environmental Protection Agency (IEPA) for the revised Feasibility Study (FS) that presented the proposed breakdown for separate operating units. IEPA responded on August 10<sup>th</sup> providing comments on the draft Table of Contents.
- On August 6<sup>th</sup>, CEMREC transmitted a draft Remedial Action Objectives (RAO) table and draft Vapor Intrusion Assessment via email as interim submittals to supplement the FS revisions.
- On August 10<sup>th</sup>, CEMREC transmitted the Separator 7 Area Pre-Remedial Design Evaluation Field Pilot Study Work Plan for IEPA review.
- On August 13<sup>th</sup>, CEMREC transmitted an email response to the outstanding comments to IEPA Evaluation of Response to FS comments and provided historic documentation related to the Land Treatment Unit (LTU).
- On August 17<sup>th</sup>, CEMREC transmitted a field work notification for the installation of the Light Non-Aqueous Phase Liquid (LNAPL) Biosparge/Biovent Pilot Test as well as notification for a new subcontractor at the Site.



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- On August 20<sup>th</sup>, IEPA transmitted comments on the Draft Screening Level Vapor Intrusion Assessment via email and indicated that a formal response will not be transmitted.
- CEMREC submitted the 2021 Annual Monitoring Report for the Embarras River Bank Stabilization Project to the United States Army Corp of Engineers on August 20<sup>th</sup>.
- On August 24<sup>th</sup>, IEPA transmitted comments on the Draft RAO tables via email and indicated a formal response will not be transmitted.
- On August 27<sup>th</sup>, CEMREC transmitted a field work notification for the annual groundwater sampling event, quarterly sulfate pilot study sampling event and the baseline sampling event for the LNAPL Biosparge/Biovent Pilot Test.
- On August 30<sup>th</sup>, CEMREC submitted a summary report letter for the Separator 7 Area Pipe and Debris Removal activities.
- On August 31<sup>st</sup>, CEMREC initiated the installation of the LNAPL Biosparge/Biovent Pilot Test monitoring and biosparge/biovent well network.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of September 2021 include:

- Collect water samples (if there is sufficient flow) from Outfall 001 and analyze for quarterly NPDES parameters as specified in permit number IL0004219.
- Continue implementation of Bioventing/Air Sparging Pilot Test Work Plan that was approved by IEPA on July 1<sup>st</sup>.
- Conduct the annual groundwater sampling event and quarterly sulfate pilot study groundwater sampling event.
- Submittal of a revised LTU Asbestos Containing Material Removal Work Plan following IEPA comments on the original work plan transmitted on July 21, 2021.



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- Interim submittals to IEPA of supplemental information to support the FS review including revised Remedial Action Objectives and a revised draft vapor intrusion screening level assessment.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of September 2021.

Please contact me at (513) 505-6297 with any questions regarding this submittal.

Sincerely,  
Trihydro Corporation

Matt Mitchell  
Project Manager

cc: James Kropid, IEPA  
Joe Girardi, Girardi Law LLC  
Matt Mitchell, Trihydro  
Ray Mastrodonardo, Tetra-Tec

Dave Arnold, Stantec  
Ronald Clark, IDPH  
John Aweeka, CEMREC

Brad Frost, IEPA  
Beth Whetsell, IDNR  
Henry Stremlau, CEMREC

Tom Rinehart, CEMREC  
Giang-Van Nguyen, USEPA  
Eric Hetrick, CEMREC

339-020-021





October 12, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: September 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This September 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of September, the Site One Team have logged a total of 1,209,689 incident free work hours.
- On September 1<sup>st</sup>, Chevron Environmental Management and Real Estate Company (CEMREC) initiated the installation of the Biovent/Biosparge Pilot Test monitoring and biosparge/biovent well network in accordance with the Bioventing/Biosparging Pilot Test Work Plan dated May 10, 2021.
- On September 8<sup>th</sup> Illinois Environmental Protection Agency (IEPA) agreed to CEMREC's September 3, 2021 request for an extension of the submittal of the draft redline Feasibility Study (FS) and final FS.
- On September 9<sup>th</sup>, IEPA transmitted a formal response to the CEMREC Response to IEPA Evaluation of Response to Feasibility Study Comments dated July 8, 2021, as well as the follow-on discussions and documentation CEMREC provided to IEPA on August 13, 2021
- During the week of September 13<sup>th</sup>, CEMREC conducted the quarterly groundwater sampling event for the Land Application Sulfate Pilot Study.
- On September 20<sup>th</sup>, CEMREC transmitted a field work schedule update notification for the Annual Groundwater Monitoring event.
- On September 21<sup>st</sup>, a Chevron/Lawrence County Community Advisory Council meeting was held virtually with IEPA in attendance.
- On September 21<sup>st</sup>, CEMREC initiated the baseline monitoring sampling activities for the Bioventing/Biosparging Pilot Test.



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October 12, 2021

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- On September 21<sup>st</sup>, IEPA transmitted additional responses to CEMREC's July 8, 2021 comments regarding the LTU and B&O Pond areas.
- On September 23<sup>rd</sup>, CEMREC transmitted a response to IEPA's August 24, 2021 comments regarding the Feasibility Study Remedial Action Objectives (RAOs).
- On September 30<sup>th</sup>, IEPA transmitted review comments to CEMREC for the Separator 7 Pre-Remedial Design Evaluation Field Pilot Study Work Plan.
- On September 30<sup>th</sup>, CEMREC transmitted a response to IEPA's July 21<sup>st</sup> comments and a Revised Land Treatment Unit Asbestos Containing Material Removal Work Plan.
- On September 30<sup>th</sup>, CEMREC transmitted a response to IEPA's August 20<sup>th</sup> comments and a Revised Vapor Intrusion Evaluation for the Former Indian Refinery Site.
- Water samples were not collected for the quarterly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219 due to no stormwater flow to the outfall.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of October 2021 include:

- Collect water samples (if there is sufficient flow) from Outfall 001 and analyze for quarterly NPDES parameters as specified in permit number IL0004219.
- Continue implementation of Bioventing/Air Sparging Pilot Test Work Plan that was approved by IEPA on July 1<sup>st</sup>.
- Conduct the annual groundwater sampling event.
- Conduct asbestos investigation and removal in the LTU Area if the work plan is approved.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall continue.
- Continue site security and maintenance.



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October 12, 2021  
Page 3

- No significant problems are anticipated for the month of September 2021.

Please contact me at (513) 505-6297 with any questions regarding this submittal.

Sincerely,  
Trihydro Corporation

Matt Mitchell  
Project Manager

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339-020-021



November 12, 2021

Ms. Charlene Falco  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Ms. Falco:

Re: October 2021 Monthly Progress Report for the Former Indian Refinery Site  
Lawrenceville, Illinois

This October 2021 Monthly Progress Report is being submitted on behalf of Texaco Inc. (Texaco) for the above referenced Site. This report is submitted in accordance with Section V.8. (6)(a) of the October 2001 Consent Decree (CD) between the State of Illinois and Texaco. Work conducted during this reporting period included:

- Through the end of October, the Site One Team have logged a total of 1,212,206 incident free work hours.
- On October 1<sup>st</sup>, Illinois Environmental Protection Agency (IEPA) provided review comments of the Pre-Remedial Design Evaluation Field Pilot Study Work Plan for the Separator 7 Area dated July 16, 2021.
- On October 5<sup>th</sup>, IEPA provided supplemental comments for the Feasibility Study (FS) related to the Land Treatment Unit (LTU) and B&O Pond Area.
- On October 6<sup>th</sup>, IEPA transmitted additional comments on the Remedial Action Objectives (RAOs).
- On October 11<sup>th</sup>, due to continued discussions and negotiations for the content within the Feasibility Study, Chevron Environmental Management and Real Estate Company (CEMREC) proposed an alternate schedule via email to IEPA for the submittal of the Feasibility Study.
- On October 11<sup>th</sup>, water samples were collected and analyzed for quarterly National Pollutant Discharge Elimination System (NPDES) parameters as specified in permit number IL0004219. Laboratory analytical results were received on October 28<sup>th</sup>.
- On October 13<sup>th</sup>, the IEPA approved the Land Treatment Unit Asbestos Containing Material Removal Work Plan. CEMREC provided notification that the field activities described in this work plan were scheduled to begin on November 2<sup>nd</sup>, 2021.
- During the week of October 18<sup>th</sup>, CEMREC conducted the annual perimeter monitoring wells groundwater sampling event.



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- On October 14<sup>th</sup>, CEMREC transmitted responses via email to the IEPA comments for the B&O Pond area dated September 21, 2021 and IEPA's evaluation of the RAOs dated October 5, 2021. CEMREC also transmitted revised Applicable or Relevant and Appropriate Requirements (ARARs) tables.
- On October 19<sup>th</sup>, IEPA transmitted comments via email on the revised Screening Level Vapor Intrusion Evaluation dated September 29<sup>th</sup>.
- On October 21<sup>st</sup>, CEMREC initiated the first biosparge test in accordance with the Bioventing/Biosparging Pilot Test Work Plan dated May 10, 2021.
- On October 25<sup>th</sup>, CEMREC provided a response via email to IEPA comments and revised text for the Screening Level Vapor Intrusion Assessment.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall were conducted.
- Site security and maintenance continued.
- No significant problems occurred during this reporting period.

Activities planned for the month of November 2021 include:

- Collect water samples (if there is sufficient flow) from Outfall 001 and analyze for monthly NPDES parameters as specified in permit number IL0004219.
- Continue the implementation of Bioventing/Biosparging Pilot Test Work Plan that was approved by IEPA on July 1<sup>st</sup>.
- Conduct a Chevron/Lawrence County Community Advisory Council meeting to be held virtually and in person scheduled for November 16<sup>th</sup>.
- Conduct asbestos investigation and removal in the LTU Area.
- Monthly inspections of City sewer man-hole MH-5 in Tank Farm C and the sewer outfall will continue.
- Continue site security and maintenance.
- No significant problems are anticipated for the month of November 2021.





Ms. Charlene Falco  
November 12, 2021  
Page 3

Please contact me at (513) 505-6297 with any questions regarding this submittal.

Sincerely,  
Trihydro Corporation

Matt Mitchell  
Project Manager

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